



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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US EPA RECORDS CENTER REGION 5



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February 19, 2016

Mr. Daniel Grapski
ExxonMobil Environmental Services
25915 S. Frontage Road
SH&E Building/Room 236
Channahon, IL 60410

Mr. Wilmer Reyes
CBS Operations
20 Stanwix Street, 10th Floor
Pittsburgh, PA 15222

Re: 0110300003 – Bureau County
New Jersey Zinc/Mobil Chemical
Superfund/Technical Reports

Re: Operable Unit 3 – Former Plant Site Area

Dear Mr. Grapski and Mr. Reyes:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the revised *Screening Level Human Health Risk Evaluation* (SLHHRE) dated January 25, 2016 and the *Final Screening Level Human Health Risk Evaluation for OU3, DePue site, DePue, Illinois* dated January 2016 and received February 16, 2016. The SLHHRE was prepared by Ramboll Environ on behalf of the DePue Group.

The January 25, 2016 version incorporated Illinois EPA's comments of December 10, 2015, January 14, 2016, and January 19, 2016 comments which originated with the Village of DePue. Illinois EPA provided an additional comment via e-mail on February 10, 2016 regarding a text change in Section 9.6, which has since been addressed as Illinois EPA requested and is reflected in the Final.

This correspondence serves as Illinois EPA's approval of the Final SLHHRE for OU3.

Illinois EPA takes this opportunity to reiterate three important points regarding the long term management of risk on OU3:

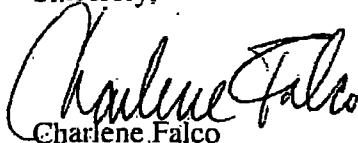
- The environmental covenant that currently exists between Zinc Corporation of America (ZCA) and Viacom/CBS regarding the ZCA parcels is not an adequate environmental covenant pursuant to Illinois' Uniform Environmental Covenant Act (UECA) to serve as a final remedy component for OU3. Just as other portions of OU3 will require an environmental covenant pursuant to the UECA, so will the ZCA parcel(s) as part of the final remedy for OU3.
- The DePue Group has indicated that an environmental covenant will be placed on the former plant property restricting exposure to soils below 3 feet for the future industrial worker. This essentially means that soils below 3 feet could not be brought to the

surface, or if soils are brought to the surface, the appropriate controls are in place (through containment, segregation, and management, etc.) to control exposure. Control of such soils will require consideration during the Feasibility Study for the site.

- Should the DePue Group's position on the future use of the property change at any time such that recreational or other uses not already evaluated in the SLHRRE could be permitted, the appropriate risk evaluations may need to be conducted.

If you have any questions or need additional information, please contact me at 217-785-2891 or at Charlene.falco@illinois.gov.

Sincerely,



Charlene Falco
Project Manager
Federal Site Remediation Section
Bureau of Land

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cc: Joe Abel, ExxonMobil (via e-mail)
Kevin Phillips, E&E
Colleen Moynihan, USEPA Region 5
Beth Wallace, Office of the Illinois Attorney General
Jamie Getz, Office of the Illinois Attorney General (via e-mail)
Beth Whetsell, Illinois Department of Natural Resources
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